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ABSTRACT

The purpose of this paper is to show that for an evaluation to be a successful change effort, the evaluator must not only "preach" (simply report facts) but also "meddle" (judge quality and recommend changes). It appears that if the evaluator does not take a leadership role in pushing for modification, these modifications will not occur. This point is illustrated by a history of a reading evaluation program in the Eugene, Oregon, Public Schools. When the research, development, and evaluation (RD&E) unit discovered that district reading achievement was below reasonable expectations for Eugene's socioeconomic status, they first "meddled" by convincing the superintendent and board to release achievement scores to the news media. Then reasonable expectations for achievement levels were calculated by the evaluation unit and released by the superintendent and board. This meddling was the impetus for a districtwide evaluation of the school reading program in which the evaluation staff gave only technical assistance. After the evaluation report was in, the evaluation staff pushed for the development of a reading implementation plan. Results of the efforts of the evaluation unit include higher expectations for achievement in the schools, a greater tolerance for criticism of programs, a reading plan in each building, and rising achievement scores. (Author/JM)

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ETHICAL, POLITICAL AND ORGANIZATIONAL ISSUES: "PREACHIN" AND "MEDDLIN"

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Ethical, Political and Organizational Issues: "Preachin" and "Meddlin"

Introduction

This paper is one part of a three part symposium that describes the conduct of a total district reading evaluation during the 1977-78 school year. The first paper in this symposium describes the evaluation study, the design, procedures of data collection, results, and analysis of the data (Stephens 1979). The second paper describes the sociological implications of the working style of the evaluators during the conduct of the evaluation study (Hendrickson 1979). This paper describes the political, ethical and organizational issues surrounding the conduct of a large scale evaluation.

The purposes for conducting an evaluation are generally consistent throughout the various evaluation models that one has access to, to use as a guide in the conduct of a program evaluation. Worthen and Sanders (1973) provide a clear set of comparisons across various evaluation models. An analysis of their comparative description of evaluation approaches, pp 209-217, allows a conclusion that the purpose of the extant models is to provide data to decision makers to determine whether to improve, maintain or terminate a program. Other purposes involve such things as attempting to discover whether a program is achieving its expressed objective, whether it is being managed well, or whether it is cost effective. The controversy, if one actually exists, inherent in existing models revolves around the role of the evaluator. Should the evaluator judge the quality of a program or non-program and recommend changes, or should facts simply be reported and let others judge? Should he preach or should he meddle?

You will recall the old joke where the wealthy owner of a local automobile agency got religion and personally paid the salary of the new young parson in his church. The parson, renowned for his critical appraisal of the distasteful practices of businesses in the community, was continually supported by his

wealthy benefactor as his sermons pointed out the inhumane conduct of various businesses, until one Sunday the parson spoke eloquently of the misdeeds done unto the community by the local used car dealers. At that point the wealthy benefactor rose and said, "Preacher, you done gone from preaching to meddlin!" And that, simply is the point of this paper, at what point, if ever, does the evaluator stop preaching (simply presenting data) and start meddling (attempting to modify parts of the system)?

After 14 years in this business of field-based research and evaluation I have reached the conclusion that the Research Evaluator must be a meddler in order to ensure that evaluation activities will actually improve the system.

The purpose of this paper is to show that for an evaluation to be a successful change effort, the evaluator must go from preaching to meddlin. He/she must certainly be a risk taker, scrupulously honest in terms of the profession of research/evaluation, as objective as possible, and as many of those other things that evaluators value (Webster 1976) (Barber 1976). For ten years there has been a debate in educational evaluation about the political roles of the evaluator in the use of the results of their work. This debate centers on the role the evaluator should play in influencing the system through decision making. Scriven (1967) took the view that the evaluator should be a judge and in that role perform an evaluation of a program and pass judgement on the quality of the program being evaluated; thereby taking an actual role in the modification of the system. Stake (1967) in his early work considered the role of the evaluator to be an assistant in judging the quality of the programs evaluated. Provus (1969) indicated that the evaluator should be a party to the decision making process but separate from it, ie. not usurp the role of the administrator or decision maker. Hammond (1969), Stufflebeam (1968) and Alkin (1969) all suggest that evaluation results are to be used by the decision makers and can assist in decision making but should be independent.

When the results of an evaluation suggests modifications in a program the fact of the matter is that if the evaluator does not take a leadership role in pushing for modifications those modifications will not occur. I would like to illustrate this point by describing the events which occurred during evaluation

of the reading instruction in the Eugene, Oregon public schools.

Earlier in this symposium you were given a comprehensive description of the Eugene, Oregon public schools reading evaluation (Stephens 1979). What I would like to do is to show the evaluator's role, describe the socio-political context that brought about this evaluation and point out how evaluators used the results of the evaluation to promote effective, extensive change in the reading instruction in the district's elementary schools.

In 1974 the RD&E unit carried out an analysis of achievement scores, socio-economic data, and other demographic variables, such as the educational bsckground of the parents of students in the school system. This analysis indicated that the educational level of parents in the district was well above average for the U.S. yet the measured achievement in the district was far below similar districts and well below what the community should expect given the type of population that existed in this school district.

As a result of that conclusion, evaluators performed their first act of meddling. Our analysis was presented to the superintendent and upon our recommendation, backed by a supportive school board, the superintendent agreed to release to the news media all achievement scores of the school district by school and grade level. To our knowledge this was the first time this had been done in the state of Oregon. Later we were to introduce the results of our comparative analysis as justification for a release of the achievement scores and of our concern about the district's reading achievement levels. The purpose of the evaluators and the administration of the district was to put a little light on the problem of the teaching of reading within the school district.

In 1974 achievement scores were generally below the 50th percentile. When the test data were released, the evaluation and research unit developed an in-service training package to train teachers and administrators how to interpret data to other staff and parents.

After the trauma about the release of achievement scores had died down and the scores had been interpreted, the evaluation unit promoted three independent

studies to examine expectancy levels for reading achievement in the Eugene district. This proved to be a far more difficult problem than anticipated. Although we were unsatisfied with the methodology used, the results of the three independent studies indicated that an expectation of approximately the 70th to 75th percentile was reasonable. In retrospect this was not an unreasonable conclusion as the districts second grade scores were at the 75th percentile two years later. Given that expectancy level, the evaluation staff again meddled and prepared for release by the superintendent a series of public statements about what the expectancy levels in reading should be for this school district. As might be expected, there were many comments from the public about reading and reading achievement within this school district. This expressed itself in the form of patrons coming to school board meetings, letters to the editor, editorial comments, etc. As a result of this public demand for increases in reading achievement the superintendent and evaluation staff recommended that a wholesale evaluation of the district reading program be done in order to identify the problems of why children are not reading as well as they should and to examine that problem as thoroughly as possible. Thus, capitalizing on an already existing concern with reading achievement levels in the public and school board, the evaluation unit stimulated this wherein by defining the problem and setting expectancy levels.

The school board, at the superintendent's recommendation, prompted by the evaluators, mandated that a district wide evaluation be conducted of the teaching of reading in the school district, provided a budget and a clear charge about what they wanted the evaluation to study and what kinds of information they would need in the future for a decision. The board also suggested that there should be a reading evaluation committee and that committee was identified by the superintendent. The committee then became the official responsible agent for the conduct of this evaluation and developed an evaluation design around a series of questions and issues. The evaluation unit, in its work with this committee, did not in our opinion perform any act of meddling. We worked as staff to the committee and attempted to fully answer the questions that they wished answers to without attempting to control the questions that were asked.

By January 1978 the evaluation was completed and presented to the board in a report titled "The First R". The conclusions of the evaluation were stated in the earlier paper by Stephens. However, one of the conclusions reached by the evaluation staff was that the primary problems with the teaching of reading in this school district were due to the absence of written plans for the teaching of reading within each building, the absence of coordination of programs within a building and the absence of coordination across each of the elementary feeder schools to the junior high schools. As a result of that conclusion, the evaluation staff with the full cooperation of the superintendent, pushed for the development of a reading implementation plan that would implement the recommendations of the evaluation committee and identify a series of acts with timelines that should be completed by the various members of the administration within the school district in order for the district to have a successful reading plan. The superintendent agreed with this strategy and promoted a plan that would both satisfy the conclusions of the evaluation staff and comply with the recommendations of the reading evaluation committee. These recommendations were agreed to by the board and board action was taken on the reading evaluation and its recommendations. Again, the evaluation staff meddled in pushing to make sure that the results of their efforts not culminate simply in the acceptance of the evaluation, but acted in a way that insured that the board would demand some form of action to rectify existing conditions. As a result of these board demands the superintendent formed a reading implementation plan committee of principals and curriculum people that the data from the reading evaluation suggested had developed successful programs within their schools and regions. That group was chaired by one of the evaluators and was charged with the responsibility of developing a plan that would comply with all of the recommendations made to the board to rectify the errors in the teaching of reading in the district. Again the evaluators meddled by being a part of the development group.

In early March 1978 a report was submitted to the board titled "Responses to the Reading Evaluation Report and Recommendations - A Plan for Implementation". (appendix I) In that report, each recommendation the board accepted was spoken to . The recommendation and the actions to be taken to implement that

recommendation were listed. The responsible office for that action and the due date were listed for when the action should be completed. This plan for implementation was accepted unanimously by the board as its plan for increasing the quality of the teaching of reading in the school district. The board mandated that the plan be put into effect immediately. The evaluation department was designated by the superintendent as being the responsible agent to ensure that each of the recommended actions be completed by the responsible party on or before the due date suggested in the implementation plan. At this point the evaluators again were meddling in that they now had become personnel evaluators of each of the responsible parties listed in the implementation plan.

As of January 1979, all recommendations outlined by the reading implementation plan had been met with the exception of two. Those two called for the hiring of outside agencies to develop a total district-wide reading plan and develop a list of competencies the district should utilize in hiring new teachers for the teaching of reading. As of April 1978, it looks as though these two recommendations will not be met.

Conclusion

The Effects of Meddling

We believe that some positive effects have occurred as a result of our meddling in the programs of this district. There now exists a much higher expectancy for achievement success in all areas of the curriculum within the Eugene schools. This expectancy, we believe, is more defensible than the lower ones that existed. As a result of this evaluation we see a process in motion for other areas of the curriculum that allows program innovation and modification on the basis of the data and process checks that have improved the teaching throughout the district. We feel a greater tolerance for criticism of existing programs and therefore allowance for earlier correction

of problems than before the reading evaluation. There is certainly a greater awareness that problems can and do exist than there was and certainly a greater tolerance toward "fixing" those problems. Each building now has a written plan for the teaching of reading that coordinates the efforts of the staff in that building with each level in the building and other levels across buildings. This same phenomena is occurring with math plans, writing coordination plans and other curriculum plans in the district. Inservice training plans have been modified to reflect needed training pointed out by the evaluation. Achievement scores are on the rise throughout the district. 1979 tests have not been administered as of this writing so that chapter of the story has not yet been written. All in all we consider the meddling to have been worth the trauma generated by it. As Stake said:

> "The educator's disdain of formal evaluation is due also to his sensitivity to criticism - and his is a critical clientele. It is not uncommon for him to draw before him such curtains as "national norm comparisons," "innovation phase," and "academic freedom" to avoid exposure through evaluation. The "politics" of evaluation is an interesting issue in itself, but it is not the issue here. The issue here is the potential contribution to education of formal evaluation. Today, educators fail to perceive what formal evaluation could do for them. They should be imploring measurement specialists to develop a methodology that reflects the fullness, the complexity, and the importance of their programs. They are not." (Stake 1967)

However they may now be willing to try additional formal evaluators in Eugene given the willingness and cooperation of the superintendent, and board and the continued pressure from the community in its quest for knowledge about the educational programs of the district.

References

Alkin, M.C. Evaluation theory development. Evaluation Comment. 1969, 2,(1)2-7

Barber, Larry W. The Management of School Based Research and Development Paper presented at the AERA Convention proceedings, April, 1976

Hammond, R. Context evaluation of instruction in local school districts, Educational Technology, 1969, 9 (1) 13-18

Hendrickson, Leslie The Soft Line and the Hard Line: The Influence of Social Processes on the Creation of Objective Knowledge, April, 1979

Provus, M.M. Evaluation of ongoing programs in the public school system in R.W. Tyler (Ed) Educational Evaluation; New Roles: New Means The 68th yearbook of the National Society for the Study of Education, Part II, Chicago 1969

Scriven, M. The methodology of evaluation. In R. Stake (Ed) Curriculum Evaluation AERA monograph series on evaluation, No. 1, Chicago: Rand McNally, 1967

Stake, R.E. The countenance of educational evaluation. Teachers College Record 1967, 68, 523-540

Stephens, Charles E. Inventing the Multi-Variant Wheel paper presented at the AERA convention proceedings, April 1979

Stufflebeam, D.L. Evaluation as enlightenment for decision making, Columbus, Ohio: Evaluation Center, Ohio State University, 1979

Webster, William J. Competencies for Public School Evaluation Personnel, Paper presented at the AERA convention proceedings, April, 1976

Worthen, Blaine R. and Sanders, James R. Educational Evaluation: Theory and Practice, Worthington, O. Charles A. Jones, 1973

RESPONSES TO READING EVALUATION
REPORT AND RECOMMENDATIONS ...
A PLAN FOR IMPLEMENTATION
March 1978

RECOMMENDATION # 1 *The district administration should develop a data-collecting system which allows collection of comparable data from each school and students.*

Action: 1) Identify necessary resources to do such ongoing and continuous collection.

2) Identify necessary policies and procedures.

3) Coordinate these activities with existing committees in the district.

Responsibility: Research, Development, & Evaluation staff

Date Due: June, 1978

RECOMMENDATION # 2 *The district administration should develop a consistent system for student identification to monitor student progress.*

Action: 1) Assign each student a single identification number for continuous use from kindergarten through the 12th grade.

2) Use these student numbers for all district data collection.

Responsibility: Business Services staff with consultation of RD&E

Date Due: September, 1978

RECOMMENDATION # 3 *The district administration should examine the discrepancy between the second and fourth grade test scores to determine the explanation for discrepancy.*

Action 1) Use existing data.

2) Develop a set of hypotheses for discrepancies.

3) Write a summary report for the superintendent and board.

- over -

Responsibility: Regional directors and curriculum specialists with consultation of RD&E

Date Due: May, 1978

RECOMMENDATION #4 *The district administration should examine the 15 to 20 percent of the students with reading problems to determine the nature of and severity of the problems and what is being done for these students.*

Action: (See Recommendation #6)

RECOMMENDATION #5 *The district administration should initiate an analysis of those schools that have less effective programs and take the necessary steps to make them effective.*

Action: (See Recommendation #6)

RECOMMENDATION #6 *The district administration should direct each principal to review the reading evaluation report to determine the areas in which the school's reading program can be improved. The principal should be responsible for developing and implementing plans to correct the reading program deficiencies.*

The following activities should be ongoing:

Action:

1) Evaluate each school's reading program based on district criteria for an effective reading program. (See Recommendation #14)

2) Develop a reading program for each school that meets the district criteria for an effective reading program.

3) Maintain continuity and consistency in the reading program. (Teacher Recommendation #1)

4) Work with staff members to organize the reading program to obtain optimal size groups for reading instruction. (Teacher Recommendation #4)

5) Develop a program to get maximum cooperation and coordination from staff members in the total reading program. (Teacher Recommendation #5)

6) Implement a program with staff members to get the most efficient and/or effective use of teacher aide time in the reading program. (Teacher Recommendation #6)

7) Plan with staff members a necessary in-service program in reading. Work with curriculum specialists to identify budgeted money to provide time and/or consultant help for these in-service programs. (Teacher Recommendation #8)

8) Working with staff members, determine the most effective system of grouping of students to best meet children's needs. (Teacher Recommendation #9)

9) Devise an evaluation system to see that all teachers are following the district's reading scope and sequence. (Teacher Recommendation #10)

10) Working with the school's media specialist, plan a program that efficiently and effectively integrates the library and media services with the reading program. (Recommendation #8)

11) Evaluate the role of the reading specialist in the school, either for specifying the role or eliminating it. (Recommendation #13)

12) Evaluate the role of the reading specialist in relation to the district's competencies. (See Recommendation #9)

13) Identify teachers and reading specialists who need further in-service training in reading and help them obtain it. (Recommendation #11)

14) Work with the Educational Services Division to determine the necessary programs and/or direction to take with 15-20 percent of students who have reading problems. (Recommendation #4)

15) Provide a sufficient number of copies of the basic text and workbooks for every student and also provide a variety of supplemental materials for students with different ability levels. (Teacher Recommendation #2) (See Recommendation #7 for coordination of material)

16) Develop a teaching system to identify the skills to be taught and the materials to be used by each student. (Teacher Recommendation #7)

17) If these steps are followed, then the action recommended in #5 will have to be taken.

Responsibility and Dates Due: Some of the components detailed above cannot be implemented until other actions occur, such as development of district criteria for a reading program. However, each principal will develop a tentative management plan to implement steps 1-16 above. The plan will be presented to the principal's regional director no later than September 15, 1978. The directors will review the plans and submit them to the superintendent with any modifications made no later than October 14, 1978. The approved plans will be available for the information of the board no later than November 15, 1978.

The reading instruction plan for each school should make clear the purposes and problems, learning activities for students, school organization, evaluation results, and methods of student and community involvement. The teaching staff, under the leadership of the principal, should be involved in developing and carrying out the school plan. The school plan should cover as a minimum the following:

Identification of problem areas
Analysis of causes of problems
Goals for solving problems
Design of learning experiences for instructional program
- Assessment of strengths of existing program
- Use of scope and sequence
- Diagnosis of student learning needs
- Methods for diagnosing student needs
- Description of learning experiences

Program structure
- Grouping of students
- Time use and schedules
- Staff utilization
- Principles for organizing learning experiences (continuity)

- Procedures for identifying and serving students with special needs

Measurement of results
- Methods for assessing strengths and weaknesses of plan

The people in the process
- Importance of individu l student
- Who is involved and who participates
- Dissemination of information about plan
- Use of outside resources and support

RECOMMENDATION #7 *The district administration should assign the responsibility for reviewing new reading programs and changing old programs.*

Actions:

1) The regional directors will be responsible for approval of plans for schools in their regions. The directors will develop a schedule for tasks, develop further guidelines for the preparation of reading instruction plans, make clear the methods by which the schools get help or support, and indicate the expectations and monitoring plans of the regional office. The regional directors must provide support to the local schools by making resources (in-service, consultants, sharing of ideas from other schools, etc.) available. The regional directors will monitor and evaluate the program of each school by analyzing test data, visiting schools, observing the reading program, and talking with teachers, administrators, students, and parents.

2) The regional directors will provide money for release time for teachers of reading to review new materials and programs and make recommendations to the superintendent. This process should be completed every two years and should be coordinated by the instructional materials analyst.

3) The instructional materials analyst will continue to determine whether the new materials meet federal, state, or local guidelines for sexism, racism, or other stereotyping.

4) A system should be developed by the curriculum specialists and the instructional materials

analyst to inform principals and teachers of available materials which are not in use or could be shared. This would result in a saving to the district as well as better utilization of materials.

Responsibility: Regional directors, curriculum specialists, instructional materials analyst

Dates Due: Action 1, September, 1978
Action 2, Ongoing
Action 3, January 1, 1979
Action 4, January 1, 1979

RECOMMENDATION #8 *The district administration should direct principals to examine the role of media specialists in their buildings in order to provide a library program that is integrated with the reading program.*

In addition to Recommendation #8, the board approved the following:

Principals should take the responsibility for working with their staff members to insure that library and reading programs complement each other whether or not a school has a media specialist for its library program. In addition, the board should request the district administration to examine the role of the media specialist to determine:

a - The need for district coordination of specialists,
b - responsibilities of the specialist in the individual building program,
c - whether each building can benefit from the services of a reading specialist.

Actions: 1) No immediate action is indicated on part "a." As long as decisions about each individual school's reading program are made at the building level, there is no need to consider district-wide coordination of the activities of the media specialists in the various buildings as suggested.

2) For the same reason as above, no action by the district administration is needed for parts "b" and "c." These two parts of the recommendation are covered in Recommendation #6, item 10.

3) Position descriptions have been drafted and will be presented to the board for consideration in late spring, 1978.

Responsibility: Action 3, superintendent and director of personnel

Dates Due: Action 3, spring, 1978

RECOMMENDATION #9 *The district administration should be responsible for specifying competencies of elementary:*
a - teachers for teaching reading,
b - principals for administering a school's reading instruction,
c - reading specialists.

Action: To comply with Recommendations #9 and #14, it is suggested that a three or four-member task force be appointed by the superintendent to develop a request for proposals to hire an outside contractor to do the following:

a - identify a set of behavorial competencies that the district would require of elementary reading teachers, elementary school principals, and elementary reading specialists. (Recommendation #9)

b - Establish the criteria for an effective elementary reading program. This should include at least the following: (Recommendation #14)
1 - Planning phases
2 - Development phases
3 - In-service phases
4 - Implementation phases
5 - Assessment phases
6 - Evaluation component

Responsibility: Superintendent and task force

Dates Due:
a - The request for proposals should be submitted by the task force no later than June, 1978.
b - Contractors should be identified and proposals examined through the summer of 1978.
c - Contracts should be let no later than October, 1978.

d - The first deadline date for the receipt of the competencies should be April, 1979. By that date, the contractor should provide a tentative set of competencies. These will be available to district personnel for examination and editing, to be resubmitted to the contractor no later than June, 1979. The contractor's final report shall be available to the district no later than September 1, 1979.

RECOMMENDATION #10 *The district administration should be responsible for assessing the elementary teachers', principals', and reading specialists' competencies for teaching and/or administering the reading program.* (See Recommendation #9)

RECOMMENDATION #11 *The district administration should be responsible for developing and implementing an in-service program for elementary teachers, principals, and reading specialists who have not yet met the required competencies for reading instruction.*

Actions: 1) Implement an in-service program for teachers, reading specialists, and principals.

2) Identify staff members who need further in-service training and help them obtain it.

Responsibility: Regional directors and curriculum specialists

Date Due: Immediately following conclusion of Action in Recommendation #9.

RECOMMENDATION #12 *The board should be responsible for modifying its hiring, promotion, and retention policies to insure that teachers, principals, and reading specialists have the required competencies for reading instruction.*

Actions: 1) Hold the recommendation in abeyance until Recommendations #9 and #10 are implemented.

RECOMMENDATION #13 *The district administration should examine the role of the reading specialist in the district's*

reading program to determine:

a - the need for district coordination of specialists,
b - responsibilities for the specialist in the individual building program,
c - whether each building can benefit from the services of a reading specialist.

Actions:

1) No immediate action is indicated on part "a." As long as decisions about each individual school's reading program are made at the building level, there is no need to consider district-wide coordination of the activities of the reading specialists in the various buildings as suggested.

2) For the same reason as above, no action by the district administration is needed for parts "b" and "c." These two parts of the recommendation are covered in Recommendation #6, item 11.

3) Position descriptions have been drafted and will be presented to the board for consideration in late spring, 1978.

Responsibility: Action 3, superintendent and director of personnel.

Date Due: Action 3, spring, 1978

RECOMMENDATION #14 *The district administration should establish criteria for an effective reading program including an evaluation component and require each school to develop a plan for reading instruction which meets those criteria. (See Recommendation #9)*